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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, NATIONAL
TPS ALLIANCE, MARIELA GONZÁLEZ,
FREDDY JOSE ARAPE RIVAS, M.H.,
CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC,
VILES DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF J.M. IN SUPPORT OF
PLAINTIFFS' MOTION FOR
COMPLIANCE**

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DECLARATION OF J.M.

I, J.M., declare:

1. I came to the United States in 2022. I live in Virginia with my wife and our 6 month old daughter. My wife and I qualified for TPS under the 2023 designation and we received TPS approval and work permits. My daughter is a U.S. citizen. I am 33 years old. I am a law abiding person, and I have not had even a speeding ticket in the U.S. or any other country.
2. In Venezuela, I earned a degree in electrical engineering. In the U.S., I worked as an electrician for a commercial electricity company. I held that job for more than one year and, after my daughter was born, I earned enough to support my family while my wife stayed home with our infant daughter.
3. In January 2025, after TPS for Venezuela was extended, I submitted applications to re-register for TPS and to renew my work permit. I received receipt notices on January 23, 2025.
4. Following Judge Chen's May 30, 2025 decision, I understood that my work authorization was automatically extended because I was issued a receipt notice with that language before February 5, 2025. The May 30, 2025 decision, and the later change to the USCIS website for TPS for Venezuela, made clear that I was one of the people covered by the order, and with continued work authorization. I was relieved that I would be able to keep working, especially since I had a new baby at home.
5. In October, 2025, shortly after the Supreme Court issued the stay order, the company called my boss and told him that I could no longer work there because TPS was no longer valid.
6. I contacted Human Resources and sent them all of my documentation that I believed would show that my work authorization remained valid, as it had been before, because I had re-registered promptly after the January TPS extension for Venezuela. I attached my work permit, my renewal receipt, and my TPS documents. I also took a screenshot of the USCIS website and attached that. I also included a letter from the Venezuelan American Caucus explaining that my work authorization was valid because I had a receipt notice granting me an automatic extension.
7. It didn't matter. HR wrote back to me, "we have confirmed with our attorney that we cannot accept receipt notices for extensions after the most recent TPS changes. While it is true that

1 there used to be an auto-extension, now we still need the updated EAD card.” It didn’t make
2 any sense to me, as I believed that the auto-extension should still be valid, and was not
3 challenged by the government.

- 4 8. On October 8, 2025, I was let go from my job. They told me that if I could provide a valid
5 work permit within 60 days, I would be re-hired. If the USCIS website is updated to clarify
6 that I still have work authorization, I may be able to get my job back. If not, I do not know
7 what we will do as I do not have a way to convince my employer, or another prospective
8 employer, that I have valid work authorization even though my receipt notice says that I
9 applied and should be entitled to an auto-extension of my prior work authorization.
- 10 9. In the meantime, I am afraid to leave the house. I worry that I could be arrested by ICE and
11 be separated from my wife and baby. Before, I left for work because I had to support my
12 family, and felt that I had a purpose even as things have been so difficult. Now, I cannot even
13 do that. I never imagined that we would be in a situation like this.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed on October 21,
15 2025 in Virginia.

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18 J.M.
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